Main State and Federal Permit Requirements

- P Apply Best Available Control Technology
- P Demonstrate that new air emissions will not cause or contribute to a violation of the National Ambient Air Quality Standards
- P IDEM cannot deny a permit because:
 - ► Ozone levels may increase somewhere in the area
 - ► Solely because the region does not now meet the new ozone health standard

AIR QUALITY REVIEW FOR CONAGRA PERMIT

- 1. Evansville Region Emissions / Air Quality Data Review
 - * ConAgra is 3% of Region's Volatile Organic Compounds
 - * ConAgra is 0.1% of Region's Nitrogen Oxides Evansville Region Contributes 2-25 ppb to high ozone
 - * Rest of ozone occurs through transport into region

AIR QUALITY REVIEW FOR CONAGRA PERMIT (cont'd)

- 2. Simple Air Quality Model Reactive Plume Model IV
 - * Very simple model predicts worst-case ozone impact of 2 ppb
- 3. Detailed Air Quality Model Urban Airshed Model
 - * Model predicts ozone impacts of 0.2 ppb to 2 ppb on 8-hour average
 - * Impact on "design" ozone reading less than 1 ppb

ConAgra Satisfied All Permit Requirements

- P Air pollution controls are best in nation for soybean processors
- P New air emissions do not cause or contribute to health standard violation
- P Offset condition requires some compensating pollution reductions
- P Air quality review goes beyond USEPA requirements and other states' practices

Solving Evansville's Ozone Problem

P Deal with Ozone Transport into Metropolitan Areas

P Implement Regional Solutions

- Nitrogen Oxide reductions from power plants, boilers, others
- ► Tighter national automobile standards
- Cleaner gasoline nationally

Solving Evansville's Ozone Problem (cont'd)

P Indiana's Nitrogen Oxides Rule

- ► Draft rules publish May 1, 1999
- ► Statewide NOx emissions reduced up to 36%
- ► Surrounding states developing comparable rules
- ► Compliance required by May 2003

P Further local control measures

- As needed to meet new standard
- ► As desired to accomodate future growth

Areas That Do Not Meet New Ozone Standard

- P Most metropolitan areas in East will not meet the new standard
 - ▶ 7 areas in Indiana
- P Congress gave states until 2003 or beyond to achieve the new ozone health standard
- P Tougher new source rules are not imposed until after 2003
- P States must complete Ozone Control Plans by either April 2000 or 2003

Areas That Do Not Meet New Ozone Standard (cont'd)

- P USEPA assumes the Nitrogen Oxides reduction plan will solve Evansville's ozone problem and account for industrial growth
- P States' Ozone Control Plans will account for some growth
 - By industry and commerce
 - In transportation

Next Steps for Evansville Region

P Incorporate statewide / regionwide NOx controls into plan

P Finish further Urban Airshed Modeling to determine need for local control measures

P Select any desired local control measures

- ► To meet the new ozone standard
- ► To allow for any desired growth